

WHY DID SAFETY (Specialized
Safety/Contract Safety) SHOW UP
AT YOUR PREAWARD
SURVEY PARTY?

BRUCE FRASER
DISTRICT EAST
SPECIALIZED SAFETY
MANAGER

(617) 753-3154

wfraser@dcmde.dla.mil

TYPES OF PREAWARD SURVEYS PERFORMED BY SPECIALIZED SAFETY

- AMMUNITION AND EXPLOSIVES
- INTO-PLANE
- OTHER (Must have some contractual safety or environmental reference. Can be in the Statement of Work, a noted FAR or DFARS, safety requirements listed in the contract, or in an appendix. An example is Remediation of Unexploded Ordnance. (Environmental preaward surveys will be addressed by Steve Kraus.)

DO YOU KNOW WHO
DOES YOUR PREAWARD
SAFETY SURVEYS?

LOCATIONS of SAFETY SPECIALISTS EAST

- Atlanta 1
- Baltimore 1
- Birmingham 2
- Boston 1
- Cleveland 1
- Dayton 2
- Detroit 1
- Hartford 1
- Long Island 1
- Orlando 1
- Philadelphia 1
- Pittsburgh 1
- St. Petersburg 1
- Springfield 1
- APMO 1
- Boeing Philadelphia 1
- GEAE Cincinnati 1
- Lockheed Martin
Marietta 1

LOCATION of SAFETY SPECIALISTS WEST

- Chicago 1
- Dallas 2
- Denver 2
- Denver-Utah 2
- Phoenix 2
- San Antonio 2
- San Francisco 2
- Santa Ana 2
- Seattle 2
- St. Louis 2
- Twin Cities 2
- Van Nuys 3
- Wichita 1
- Boeing Long Beach 1
- Boeing St. Louis 1
- Lockheed Martin Ft.
Worth (position currently
vacant) 1
- Thiokol 1

LOCATION of SAFETY SPECIALISTS INTERNATIONAL

- Japan (Looking for second person.) 1
- Northern Europe (England) 2
- Saudi Arabia 1
- Southern Europe (Germany) 2

ONE BOOK PREAWARD

CHAPTER 3.1

- 3. DCMC POLICY
 - B. It is a mandatory DOD requirement to perform a Safety PAS on Ammunition & Explosives Contracts. See contract safety requirements-ammunition, explosives and other postaward hazardous/safety requirements. DoD policy ensures contractors take reasonable precautions as implemented by DoD Manual 4145.26M, DOD Contractor's Safety Manual for Ammunition and Explosives.

AMMUNITION & EXPLOSIVE FAR

- FAR 42.302 (a) (39)
 - Ensure contractor compliance with contractual safety requirements.

AMMUNITION & EXPLOSIVE DFARS

- DFARS SubPart 223.370-4,(a),(4)
 - Preaward survey.
 - Before awarding any contract, including purchase orders, involving ammunition and explosives, obtain a preaward ammunition and explosives safety survey. If the prospective contractor proposes subcontracting any ammunitions or explosive work, include a review of the subcontractor's facility in the preaward survey.

AMMUNITION & EXPLOSIVE DFARS CLAUSES

- DFARS 252.223-7002
 - Safety Precautions for Ammunition and Explosives.
- DFARS 252.223-7003
 - Change in Place of Performance-Ammunition and Explosive.

DFARS 252.223-7002

- DFARS SubPart 252.223-7002 (b) (1)
 - The Contractor shall comply with the requirements of the DoD Contractors' Safety Manual for Ammunition and Explosives, DoD 4145.26M, hereafter referred to as "the manual," in effect on the date of the solicitation for this contract.
- The DoD Contractors' Safety Manual for Ammunition and Explosives currently in effect is dated September 16, 1997.

DoD 4145.26M

Chapter 1, Section G.

Pre-award safety survey

- G.,2. During the pre-award safety survey, the contractor, as a minimum shall provide the following for review:
 - Site plans
 - Safety program, organization, and training
 - Fire protection program and available firefighting resources
 - Description of facility
 - Operational compliance with applicable Federal, State, and local requirements

DoD 4145.26M

Chapter 1, Section G.,2 (continued)

- Required licenses or capability to obtain those required to perform proposed contract work
- Past safety history, including reports of safety surveys by Federal, State, or local safety, fire prevention, insurance, or other authorities; current status of waivers or exemptions issued by Federal, State, or local authorities; and mishap experience
- A&E collection and disposal systems and procedures
- Hazard analysis as appropriate

DFARS 252.223-7002

- DFARS SubPart 252.223-7002 (b) (2)
 - The Contractor shall allow the Government access to the Contractor's facility, personnel, and safety program documentation. The contractor shall allow authorized Government representatives to evaluate safety programs, implementation, and facilities.

DFARS 252.223-7002

- DFARS SubPart 252.223-7002 (g) (4)
 - The contractor shall notify the Contracting Officer or authorized representative before issuing any subcontract when it involves ammunition or explosives. If the proposed subcontract represents a change in the place of performance, the Contractor shall request approval for such change in accordance with the clause of this contract entitled “Change in Place of Performance - A&E”.

DFARS 252.223-7003

CHANGE IN PLACE OF PERFORMANCE

- DFARS SubPart 252.223-7003 (a)
 - The Offeror shall identify, in the “Place of Performance” provision of this solicitation, the place of performance of all ammunition and explosives work covered by the Safety Precautions for Ammunition and Explosives clause of this solicitation.

DFARS 252.223-7003

CHANGE IN PLACE OF PERFORMANCE

DFARS SubPart 252.223-7003 (b)

- The Offeror agrees not to change the place of performance of any portion of the offer covered by the Safety Precautions for Ammunition and Explosives clause contained in this solicitation after the date set for receipt of offers without approval of the Contracting Officer. The Contracting Officer shall grant approval only if there is enough time for the Government to perform the necessary safety reviews on the new proposed place of performance.

DFARS 252.223-7003 CHANGE IN PLACE OF PERFORMANCE

- DFARS SubPart 252.223-7003 (c)
 - If a contract results from this offer, the Contractor agrees not to change any place of performance previously cited without advanced written approval of the Contracting Officer.

INTO-PLANE PREAWARD SURVEYS

- DCMC's current and proposed philosophy.
 - DCMC specialist, either Quality or Safety, who has received proper training may, if desired by the Commander, conduct both the QA and Specialized Safety functions at preaward surveys. Right now in CONUS, both safety and QA participate in the Into-Plane preaward surveys. Due to fewer military bases, more Into-Plane contracts are being let to new Fixed Base Operations. This may/probably will change in the future.

INTO-PLANE PREAWARD SURVEYS

- What is considered proper training?
 - From FY98 and beyond, completion of J-07, Surveillance of Into-Plane Facilities course.
 - Completion of an approved Hazmat course.
 - Structured OJT (Developed by lead agent for fuels.)
 - A jointly developed surveillance plan (QA and Specialized Safety) for each Into-Plane facility.
 - DAWIA Level II certification.

COMMENTS FROM THE FIELD Continued

- Comments and problems relayed to me from safety specialists.
 - After award of contract, contractor makes direct request for safety specialist to perform Safety System audit of prospective sub-contractor.
 - Request for an A&E preaward survey on a purchase of \$4800.00. Purchase is to a vendor that buys and resells hazard class 1.4S fire bottle squibs that are sold on the commercial market. Can we have relief on such a small commercially available purchases?

COMMENTS FROM THE FIELD (CONTINUED)

- Comments and problems relayed to me from safety specialists.
 - **A&E Flow Down** A sub-contractor to McDonald Douglas (Boeing) St. Louis making bomb racks moved from New York City to Long Island. No A&E flow down clause was in the purchase order from the prime contractor to the sub-contractor which was required for testing the bomb racks. There was no knowledge of the contractor until the move was made and the QAR alerted the Safety Specialist of the testing requirements.

COMMENTS FROM THE FIELD (CONTINUED)

- Comments and problems relayed to me from safety specialists.
 - **A&E Flow Down** When the prime contractor was requested to flow down the explosive safety clauses they started playing games. The statement in the PO against DFARS 252.223-7002 read: “This clause applies only if the seller delivers ammunition or Explosives under this contract.” The contractor uses 1.4 explosives to test the bomb racks. Buying activities, we need your help twisting contractor’s arm.

COMMENTS FROM THE FIELD (CONTINUED)

- Comments and problems relayed to me from safety specialists.
 - **Need for a Preaward Survey.** Cecile Field, a Navy Base was closed and privatized under the last Base Realignment And Closure round. There are now several aircraft contractors performing maintenance on military planes at Cecile. The latest contractor to move in to perform on a maintenance contract is Boeing. It has an Air Force contract to perform maintenance on C-130s with the Flight and Ground Risk Clauses included.

COMMENTS FROM THE FIELD (CONTINUED)

- Comments and problems relayed to me from safety specialists.
 - **Need for Preaward Survey** The Navy requirements for Airfield Rescue and Fire Fighting (ARFF) are less stringent than the Air Force requirements (AFMC 91-101).
 - Cecile Field under Navy criteria does not meet the Air Force ARFF requirements. No preaward was done on the Boeing operation before the contract was awarded.

COMMENTS FROM THE FIELD (CONTINUED)

- Comments and problems relayed to me from safety specialists.
 - **ARFF** I am sure there will be requests for waivers to the Air Force asking that the fire fighting capability of the Airfield Fire Department be allowed to be short the required ARFF vehicles noted in AFMC 91-101.

COMMENTS FROM THE FIELD (CONTINUED)

- Comments and problems relayed to me from safety specialists.
 - **Need for Preaward Survey** A contract has been awarded to clean up unexploded ordnance at the bombing range in the Ocala National Forest, Florida. No preaward survey was performed. The prime contractor is Litton PRC Inc. in Virginia. The work is being performed by division of PRC Inc. located in Florida. DCMC has no prior history on this contractor.

COMMENTS FROM THE FIELD (CONTINUED)

- Comments and problems relayed to me from safety specialists.
 - **Risk to Government.** An ISO 9001certified aircraft maintenance prime contractor chose an unacceptable sub-contractor to paint the airframe. Risk to the Government at the subcontractor was unacceptable. When the contractor was told the Ground and Flight Risk Clause would not be transferred to the sub-contractor, the prime contractor found an acceptable sub-contractor for the painting process.

COMMENTS FROM THE FIELD (CONTINUED)

- Comments and problems relayed to me from safety specialists.
 - **No Preaward Survey.** A buying activity believed a preaward survey was not necessary for an A&E contractor with a good safety record. The buying activity wanted to ship 700 pounds of hazard class 1.1 propellant to the contractor even though the contractor did not have site plan approval for storage of the additional hazard class 1.1 A&E at their site.

COMMENTS FROM THE FIELD (CONTINUED)

- Comments and problems relayed to me from safety specialists.
 - **Risk to Government.** A&E contractor received a proposal from a buying activity to burn residual government furnished propellant left after production is completed instead of returning to the government. The contractor does not have appropriate EPA/State permits to perform open air burning, nor does the contractor plan to apply for permits.

IN SUMMARY

- Preaward surveys involving Specialized Safety.
- Who performs preaward safety surveys.
- A&E FAR and DFARS clauses.
- DoD 4145.26M preaward survey requirements.
- Into-Plane preaward surveys. Get ready for the changes.
- Comments from the field.